

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

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DEBORAH CHIN, Individually and :
On behalf of All Others Similarly Situated, :
 :
Plaintiffs, :
 :
v. :
 :
SONUS NETWORKS, INC., PAUL R. :
JONES, EDWARD N. HARRIS, J. :
MICHAEL O'HARA, HASSAN M. :
AHMED and STEPHEN J. NILL, :
 :
Defendants. :
-----X

Case No. 04-CV-10294 DPW

**MOTION FOR APPOINTMENT OF
LEAD PLAINTIFF AND APPROVAL
OF LEAD PLAINTIFF'S SELECTION
OF COUNSEL**

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INFORMATION DYNAMICS, LLC :
Individually and On behalf of All Others :
Similarly Situated, :
 :
Plaintiffs, :
 :
v. :
 :
SONUS NETWORKS, INC., PAUL R. :
JONES, EDWARD N. HARRIS, J. :
MICHAEL O'HARA, HASSAN M. :
AHMED and STEPHEN J. NILL, :
 :
Defendants. :
-----X

Case No. 04-CV-10308 DPW

-----X
PETER KALTMAN, Individually and On :
behalf of All Others Similarly Situated, :

Case No. 04-CV-10309 DPW

Plaintiffs, :

v. :

SONUS NETWORKS, INC., PAUL R. :
JONES, EDWARD N. HARRIS, J. :
MICHAEL O'HARA, HASSAN M. :
AHMED and STEPHEN J. NILL, :

Defendants. :

-----X
-----X
SAMANTHA DEN, Individually and On :
behalf of All Others Similarly Situated, :

Case No. 04-CV-10310 DPW

Plaintiffs, :

v. :

SONUS NETWORKS, INC., PAUL R. :
JONES, EDWARD N. HARRIS, J. :
MICHAEL O'HARA, HASSAN M. :
AHMED and STEPHEN J. NILL, :

Defendants. :

-----X
-----X
RONALD KASSOVER, Individually and :
On behalf of All Others Similarly Situated, :

Case No. 04-CV-10329 DPW

Plaintiffs, :

v. :

SONUS NETWORKS, INC., PAUL R. :
JONES, EDWARD N. HARRIS, J. :
MICHAEL O'HARA, HASSAN M. :
AHMED and STEPHEN J. NILL, :

Defendants. :
-----X

-----X
STEVE L. BAKER, Individually and On :
behalf of All Others Similarly Situated, :
 :
Plaintiffs, :
 :
v. :
 :
SONUS NETWORKS, INC., PAUL R. :
JONES, EDWARD N. HARRIS, J. :
MICHAEL O'HARA, HASSAN M. :
AHMED and STEPHEN J. NILL, :
 :
Defendants. :
-----X

Case No. 04-CV-10333 DPW

-----X
-----X
HAIMING HU, Individually and On :
behalf of All Others Similarly Situated, :
 :
Plaintiffs, :
 :
v. :
 :
SONUS NETWORKS, INC., PAUL R. :
JONES, EDWARD N. HARRIS, J. :
MICHAEL O'HARA, HASSAN M. :
AHMED and STEPHEN J. NILL, :
 :
Defendants. :
-----X

Case No. 04-CV-10346 DPW

-----X
-----X
MICHAEL KAFFEE, Individually and On :
behalf of All Others Similarly Situated, :
 :
Plaintiffs, :
 :
v. :
 :
SONUS NETWORKS, INC., PAUL R. :
JONES, EDWARD N. HARRIS, J. :
MICHAEL O'HARA, HASSAN M. :
AHMED and STEPHEN J. NILL, :
 :
Defendants. :
-----X

Case No. 04-CV-10345 DPW

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SANUEL HO, Individually and On	:
behalf of All Others Similarly Situated,	:
	:
Plaintiffs,	:
	:
v.	:
	:
SONUS NETWORKS, INC., PAUL R.	:
JONES, EDWARD N. HARRIS, J.	:
MICHAEL O'HARA, HASSAN M.	:
AHMED and STEPHEN J. NILL,	:
	:
Defendants.	:
-----X	
-----X	
MICHELLE TREBITSCH, Individually	:
and On behalf of All Others Similarly	:
Situated,	:
	:
Plaintiffs,	:
	:
v.	:
	:
SONUS NETWORKS, INC., PAUL R.	:
JONES, EDWARD N. HARRIS, J.	:
MICHAEL O'HARA, HASSAN M.	:
AHMED and STEPHEN J. NILL,	:
	:
Defendants.	:
-----X	

Case No. 04-CV-10363 DPW

Case No. 04-CV-10307 DPW

-----X
JEFFREY RODRIGUES, Individually and :
On behalf of All Others Similarly Situated, :
:
Plaintiffs, :
:
:
v. :
:
SONUS NETWORKS, INC., PAUL R. :
JONES, EDWARD N. HARRIS, J. :
MICHAEL O'HARA, HASSAN M. :
AHMED and STEPHEN J. NILL, :
:
Defendants. :
-----X

Case No. 04-CV-10364 DPW

-----X
SHELIA BROWNELL, Individually and :
On behalf of All Others Similarly Situated, :
:
Plaintiffs, :
:
:
v. :
:
SONUS NETWORKS, INC., PAUL R. :
JONES, EDWARD N. HARRIS, J. :
MICHAEL O'HARA, HASSAN M. :
AHMED and STEPHEN J. NILL, :
:
Defendants. :
-----X

Case No. 04-CV-10597 DPW

-----X
CHARLIE STARBUCK, Individually and :
On behalf of All Others Similarly Situated, :
:
Plaintiffs, :
:
:
v. :
:
SONUS NETWORKS, INC., PAUL R. :
JONES, EDWARD N. HARRIS, J. :
MICHAEL O'HARA, HASSAN M. :
AHMED and STEPHEN J. NILL, :
:
Defendants. :
-----X

Case No. 04-CV-10362 DPW

-----X
DANIEL WILLIAMS, Individually and On :
behalf of All Others Similarly Situated, :

Plaintiffs,

V.

SONUS NETWORKS, INC., PAUL R. JONES, EDWARD N. HARRIS, J. MICHAEL O'HARA, HASSAN M. AHMED and STEPHEN J. NILL,

Defendants.

ROBERT CONTI, Individually and On
behalf of All Others Similarly Situated,

Plaintiffs,

V.

SONUS NETWORKS, INC., PAUL R. JONES, EDWARD N. HARRIS, J. MICHAEL O'HARA, HASSAN M. AHMED and STEPHEN J. NILL,

Defendants.

-----X

WHEATON ELECTRICAL SERVICES :
401(k) PLAN, Individually and On :
behalf of All Others Similarly :
Situating, :

Plaintiffs, :

v. :

SONUS NETWORKS, INC., PAUL R. :
JONES, EDWARD N. HARRIS, J. :
MICHAEL O'HARA, HASSAN M. :
AHMED and STEPHEN J. NILL, :

Defendants. :

-----X

-----X
BRIAN CLARK, Individually and On :
behalf of All Others Similarly Situated, :

Plaintiffs, :

v. :

SONUS NETWORKS, INC., PAUL R. :
JONES, EDWARD N. HARRIS, J. :
MICHAEL O'HARA, HASSAN M. :
AHMED and STEPHEN J. NILL, :

Defendants. :

-----X

Case No. 04-CV-10383 DPW

Case No. 04-CV-10454 DPW

-----X
SAVERIO PUGLIESSE, Individually and :
On behalf of All Others Similarly Situated, :
:
Plaintiffs, :
:
:
v. :
:
SONUS NETWORKS, INC., PAUL R. :
JONES, EDWARD N. HARRIS, J. :
MICHAEL O'HARA, HASSAN M. :
AHMED and STEPHEN J. NILL, :
:
Defendants. :
-----X

Case No. 04-CV-10612 DPW

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DAVID V. NOCITO, Individually and On :
behalf of All Others Similarly Situated, :
:
Plaintiffs, :
:
:
v. :
:
SONUS NETWORKS, INC., PAUL R. :
JONES, EDWARD N. HARRIS, J. :
MICHAEL O'HARA, HASSAN M. :
AHMED and STEPHEN J. NILL, :
:
Defendants. :
-----X

Case No. 04-CV-10623 DPW

Upon the Declaration of Justin S. Kudler dated April 12, 2004, and the exhibits thereto, and on the accompanying memorandum of law, proposed Lead Plaintiff Brad Rollow (“Rollow”) hereby moves this Court for an order pursuant to Section 21D(a)(3)(B) of the Securities Exchange Act of 1934, 15 U.S.C. § 78u-4(a)(3)(B), (i) appointing Mr. Rollow to serve as Lead Plaintiff in this action, and (ii) approving Lead Plaintiff’s selection of Schatz & Nobel, P.C. and Ragsdale & Frese LLC as Co- Lead Counsel.

Dated: April 12, 2004

Respectfully submitted,

SCHATZ & NOBEL, P.C.

By: /s/ Justin S. Kudler
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Counsel for Proposed Lead
Plaintiff Brad Rollow

Of Counsel:

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